

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

State of Minnesota, by its
Attorney General Lori Swanson,

Civil File No. 12-145 RHK/JJK

Plaintiff,

v.

AFFIDAVIT OF JANET LEGLER

Accretive Health, Inc.,

Defendant.

Janet Legler, being first duly sworn on oath, state as follows:

1. My name is Janet Legler. I was born in southern Georgia, but have lived in Minnesota for the past 31 years. I live in Minneapolis. I have one child. For the whole time I have lived in Minnesota, I have worked for the University of Minnesota and then the University of Minnesota Medical Center - Fairview. For the past 20 years or so, I have been a peri-operative surgery nurse. If a patient has anesthesia, the patient is seen by a nurse in my department. We make sure that patients are prepared for surgery, we take vital signs, and complete the admissions process that patients must go through. We also handle phase-two recovery, which is the end of recovery. We give patients instructions on their care after leaving the hospital.

2. In March of 2012, my leg became swollen and inflamed. I had an ultrasound, and my primary care physician recommended I go to the emergency room at the University of Minnesota Medical Center - Fairview. After being shown to a room, my vital signs were taken. My blood pressure was high, my heart rate was elevated, and I

had PVCs. A chest X-ray, lab work, and ECG were done to determine what was causing my symptoms. In the midst of laying on my side in the patient exam room, hooked up to monitors and an IV, a man came in and told me that it was a new Fairview policy that I needed to pay money that I owed Fairview. I questioned him on this, and he advised me that I owed Fairview from a previous bill that I had not yet paid. At no time was I informed that I was being asked to pay for the current visit to the emergency room. I gave the man my credit card. He then gave me a receipt, showing that my Visa card was charged \$77.68. A copy of the receipt is attached as Exhibit A. It shows that I paid \$28.78 on a purported past bill from November 8, 2011, for services at University of Minnesota Physicians Ortho, and that I paid \$48.90 for the current visit. At no point did the man advise me when I gave him my credit card that a portion of my charges were for my current visit. When the man came into my room and asked me for my credit card, I was in the middle of being diagnosed and treated. Patients are vulnerable when in the emergency room. They are worried, anxious, and often very ill. I was out of sorts at the time and was appalled when this happened.


3. After my emergency room visit, I continued to experience fluttering of my heart and a racing pulse. A cardiologist recommended that I have a cardiac MRI, thinking that my previous inflammation could be related to my current symptoms. On April 12, 2012, I checked in at the University of Minnesota Medical Center - Fairview for a cardiac MRI. The person behind the desk told me that I had to speak with somebody from admissions and billing. I was taken to a little room, and a man told me that Fairview had a new policy and that I needed to pay my bill. I told him that I did not have

any outstanding bills with Fairview. He told me that I may not have received the bills yet, and I told him that I would not pay bills that I had not seen. He told me that if I didn't pay, it would make him "look bad." I asked him whether he couldn't simply type into his computer that I had declined to pay a bill that I had not seen. He told me that the computer would not allow that. When I asked to speak to his manager, he told me that Fairview could bill me. Attached as Exhibit B is a copy of a document he gave me as a supposed "receipt" for his request that I pay \$56.25. Attached as Exhibit C is another document he gave me showing that I owed Fairview a total of \$152.46. This document is confusing. As it turns out, the \$56.25 for April 12 was for my current visit. It appears that I had already paid the entries for \$24.80 and \$24.07 from March 13, 2012, on that day. I had not yet received bills for \$19.39 from March 13, 2012, or \$27.95 from March 14, 2012.

4. I am a nurse who has worked in the Fairview system for over 30 years. Patients are vulnerable when they are ill and seeking treatment. I am concerned that these types of practices can exacerbate a patient's condition and anxiety.


 JANET LEGLER

Subscribed and sworn to before me
 this 8 day of May,
 2012.


 Notary Public





Patient Payment Receipt					
Terminal Operator: Operator #369					
Transaction Date: Mar 13 2012 1:46PM					
Batch #: 114906					
Payment Information					
Charges					
Patient	AR Number	Date of Service	Service Code	Amount Due	Payment
Janet Legler (MR: [REDACTED])					
515 N 1st St Apt 404, Minneapolis, MN 55401-2451					
		11/08/2011	UMP ORTHO	\$ 28.78	\$ 28.78
		03/13/2012	UUER	\$ 48.90	\$ 48.90
Total Paid: \$ 77.68					
Payment Method: [REDACTED]					
Card Number: [REDACTED]					
Cardholder's Name: JANET LEGLER					
Authorization Code: [REDACTED]					
Signature: X _____					

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CLATEN

**Insurance**

Insurance:

Subscriber#:

Group:

Secondary

Insurance: None

Subscriber#:

Group:

Patient Name

JANET G LEGLER

Guarantor

JANET G LEGLER

Date of Service

3/13/2012

Patient Portion

Copay:	\$0.00	Medical Services:	<i>Medical Services Rendered</i>
Co-Insurance:	10%	Total Estimated Charges:	\$815.00
Deductible Remaining:	\$8.89	Insurance Payments and Adjustments:	\$766.10
Out of Pocket Max:	Unlimited	Estimated Due:	\$48.90

The estimate provided above is not a complete statement of charges and may not reflect your total liability for the services you receive. This estimate is for current services and may not reflect additional services, physician charges, anesthesiology charges, pathology charges, or medical supplies provided during the course of your treatment. Portions of this estimate are based upon information regarding your benefits as reported by your health insurance provider. For account inquiries please call: 888-702-4073.

Paid 03/13/12

In addition, you will be billed separately for physician services such as the Emergency Room physician, radiologist, consultant or physicians involved in your care.



If Paying By Credit Card, Please Fill Out Below:



Card Number

V-Code

Print Name

Amt. Paid

Signature

Exp. Date

Due Date**Amount Due****Account #**

Upon Receipt

\$48.90

ADDRESSEE:

JANET G LEGLER
515 N 1ST ST, APT 404
MINNEAPOLIS, MN - 55401-2451

MAKE CHECKS PAYABLE AND REMIT TO:

FAIRVIEW HEALTH SERVICES
PO BOX 147
MINNEAPOLIS, MN - 55440-0147

EXHIBIT A

[illegible]

EXHIBIT B

Patient Information
 Janet Legler (MR: [REDACTED])
 515 N 1st St Apt 404, Minneapolis, MN55401-2451

Guarantor Information
 Janet Legler
 515 N 1st St Apt 404, Minneapolis, MN55401-2451

Payment Entry

Payment History

Payment Entry

Refer to FO

Patient	Type	AR Number	Service Date	Amount Due	Payment Amount	Notes
Janet Legler (MR: [REDACTED]) 515 N 1st St Apt 404, Minneapolis, MN 55401-2451						
①	Current	11001349463	09/28/2012	\$ 0.00	\$ 0.00	
①	Current	72070222	09/28/2012	\$ 0.00	\$ 0.00	
①	Current	11001313884	05/08/2012	\$ 0.00	\$ 0.00	
①	Current	71816731	05/08/2012	\$ 0.00	\$ 0.00	
①	Current	11001443937	04/12/2012	\$ 56.25	\$ 0.00	
①	Current	11001344236	04/11/2012	\$ 0.00	\$ 0.00	
①	Prior	11001295164	03/13/2012	\$ 24.80	\$ 0.00	
①	Prior	11001296863	03/13/2012	\$ 19.39	\$ 0.00	
①	Prior	11001299486	03/13/2012	\$ 24.07	\$ 0.00	
①	Prior	11001301002	03/14/2012	\$ 27.95	\$ 0.00	

Add Physician TransactionAdd Hospital Transaction

Total Due: \$ 152.46

Total Payment: \$ 0.00

Form of Payment: Please select ...

< Select Patient

Collect Payment >